



# THE PW LAW FIRM

NEW JERSEY

LC

NEW YORK

April 29, 2021

The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse,  
Room 1506 40 Foley Square  
New York, New York 10007

Application granted.

SO ORDERED.

Ronnie Abrams, U.S.D.J.  
May 4, 2021

Dear Judge Abrams:

The undersigned counsel for defendant hereby requests leave of the court to file the enclosed motion for a subpoena *duces tecum* under seal. The proposed subpoena is directed to the “victim company” a publicly traded company. Much of the information in the memorandum in support of the motion was gleamed from internal company records and third-party audit reports that were provided by the government in discovery pursuant to a protective order signed by this court dated October 13, 2020. [ECF 10].

Public filing of this motion may invade the privacy of the non-party “victim company” and reveal information that contains or reflects confidential business information (including but not limited to information pertaining to a business's network, critical systems, data storage, and information technology), and protective order is warranted to shield individuals and a business from potential invasions of privacy and/or economic harm.

Accordingly counsel respectfully request leave of the court to file the attached motion and subpoena under seal in order to shield non-party individuals and a business from potential invasions of privacy and/or economic harm.

Respectfully submitted,

/s/Paul Wiegartner, Jr.

Paul Wiegartner, Jr., Esq.  
Counsel for Defendant

PW:pjw  
Encls.

cc. Juliana Murray, Esq. (Via email)